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NATIONAL SECURITY AGENCY
CENTRAL SECURITY SERVICE
FORT GEORGE G. MEADE, MARYLAND 20755

for file

Serial: M55/9428
30 JUN 1977

SUBJECT: Draft DCID No. 1/XX, "Uniform Procedures for Administrative Handling and Accountability of Sensitive Compartmented Information (SCI)", dated 2 June 1977.

TO: Col Russell T. Newman, USAF
Director, Security and
Communications Management
Air Force Intelligence
Service (AFIS/INS)
Room BD-951, The Pentagon
Washington, DC 20330

*Updates
for DCID.
Can throw out
once DCID
is approved*

1. Staffing of the subject draft DCID through appropriate offices at NSA has resulted in tacit support for the draft. This staffing has also developed some areas of grave concern. I request that these areas be separated from the draft by means of footnotes when the draft is submitted to the Security Committee. The footnotes should be as follows:

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29 JUL 1977

MEMORANDUM FOR: Chairman
Compartmentation Subcommittee
DCI Security Committee

FROM: Robert W. Gambino
CIA Member, DCI Security Committee

SUBJECT: Draft DCID No. 1/XX, "Uniform Procedures
for Administrative Handling and Account-
ability of Sensitive Compartmented
Information (SCI) dated 2 June 1977 ☐

25X1

25X1 1. ☐ Subject draft has been coordinated within the Central Intelligence Agency (CIA). Our components offered several comments or observations which are presented below. However, we find no fault with the intent and thrust of the draft and are pleased to advise you of CIA concurrence.

25X1 2. ☐ A feeling generally expressed was that the document is considerably longer than the usual DCID. A suggestion was received that a more desirable format for the proposal would be a manual. Another proposal offered as an example as to how the document might be shortened involved removal of all of paragraph 7 concerning Minimum Standards For Control of SCI Released to Contractors and incorporate it as an annex to USIB-D-71.8-4, 12 March 1976, "SCI Policy and Release of Foreign Intelligence to Contractors."

25X1 3. ☐ Another general observation was that the draft dealt in specifics to a degree which might present a problem regarding flexibility for agencies which operate in unique environments and must adopt unique security handling procedures. CIA suggests that the proposed DCID might better be approached as a document which presents basic rather than extremely detailed security guidance for handling Sensitive Compartmented Information (SCI).

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25X1 4. [] We call your attention to the fact that the DCI has authorized CIA (CIA/OS/CIB) to function as the central control point for all SCI clearances for the entire community, to include SI and any other national program. It is suggested that this mandate be incorporated into the draft.

25X1 5. [] CIA suggests that top management would benefit from an innovation which would involve creation of a computerized data base for facility storage accreditation for SCI. We submit that CIA/OS/CIB is the logical component to house such a record and propose that expansion of a centralized record and control point be incorporated into the proposed DCID.

25X1 6. [] Comments on the specifics of the draft follow:

25X1 a. [] Paragraph 1, Purpose, page 1; paragraph 2, Applicability, pages 1 and 2

It is suggested that an inconsistency exists in the statement contained in paragraph 1 that this directive will supersede other Intelligence Community directives, as measured against the specific listing of four directives in paragraph 2 which are not to be superseded. It is suggested that clarification could be expressed through the addition of the following sentence to paragraph 1 under Purpose. "The controlsrelative to this matter, except as are hereafter noted in paragraph 2, subparagraphs a. through d.

25X1 b. [] Paragraph 4b, SCI Security Control Center (SCC)

We submit that the draft as written may permit misunderstanding as to the meaning of an SCI facility. It is not believed that the draft is intended to restrict each NFIB member to a single SCC. To avoid confusion it is suggested that the section be reworded as follows:

"Each SCI-accredited facility shall be serviced by an SCI Security Control Center which shall be the focal point for the security, receipt, control, storage and dissemination of SCI. In instances wherein it is not practical for an NFIB member to maintain a single centralized SCC the control mechanism may be established on the basis of selected components within an agency or department."

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- c. ☐ Paragraph 4c, Records, page 5, line 8

CIA submits that the six-month retention period for records of initial receipt and internal distribution of SCI material should be consistent with the two-year period specified in paragraph 4d immediately following. As written, there is no provision for accountability after the six-month cutoff. It is suggested the phrase "during the last six months" be replaced by "for a minimum of two years."

NO

for much
accumulation

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- d. ☐ Paragraph 4g, Control Numbers, page 6

CIA supports the concept of control numbers as a fundamental requirement for the accountability of SCI material. However, our internal staffing of the proposed directive surfaced a problem indirectly related to this requirement which is worthy of DCI Committee action. Finished intelligence documents containing Sensitive Compartmented Information now require different control numbers: one for accountability purposes and another for information handling control. It is strongly suggested that the DCI Intelligence Information Handling Committee be requested to address the need for two separate control numbers on such documents with a view toward developing a single Community standard to serve both purposes. Construction of this standard should include coding to identify the Agency and component thereof producing the report as well as the type(s) of compartmented information involved. Use of a single control number would both provide document accountability and also simplify the indexing and retrieval of the information therein.

for IHC
to provide
numbers

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- e. ☐ Paragraph 4i(1), Transmission, page 8,
line 12

It is suggested the sentence beginning with "These procedures" lacks clarity. We submit a proposed revision to read, "These procedures shall include the establishment of a recipient's need to know....."

OK

line

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- f. ☐ Paragraph 6i, Marking Document Components,
first sentence, page 15

CIA suggests that the referenced sentence should be followed by a statement that, at least on an optional basis, paragraph markings will include dissemination and compartmented control system caveats as well as classification levels. It is not believed that marking classification without marking compartmentation represents a practical system. The following addition is suggested:

o/b "Further, on an optional basis, markings will include dissemination and compartmented control system caveats."

25X1

- g. ☐ Paragraph 6j, Marking Magnetic Media,
page 15

o/b The need for external labels on magnetic storage media is clear. To avoid misinterpretation of the word "card" in the third line of this subparagraph, it is suggested that this term be expanded to "magnetic card." While this subparagraph adequately addresses the external label issue, no reference is made to the need for internal labels on magnetic media. It is suggested that the Compartmentation Subcommittee consult with the Computer Subcommittee to develop internal labeling requirements for inclusion in the instant directive.

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- h. ☐ Paragraph 6k, Marking Photographic Material
in Roll Form, page 15

o/b CIA has no problem with the provisions of this paragraph as they may relate to photographic materials other than microform. With respect to microform the labeling instructions of this paragraph are too restrictive. It is suggested that a new subparagraph entitled "Marking Microform Material" be developed with the assistance of the DCI Intelligence Information Handling Committee, which has been addressing for some time the security problems associated with this type of storage medium.

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Robert W. Gambino

Dissemination:

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